

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

**Dell'Italia & Santola  
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JPD1617**

**In Re:**

**LUIS REYNOSO**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

**CHAPTER 13**

**CASE NO: 22-14011**

**CERTIFICATION IN RESPONSE TO THE  
TRUSTEE'S OBJECTION TO THE PLAN**

I, John P. Dell'Italia, Esq., being of full age, do hereby certify the following:

1. I am an attorney-at-law licensed to practice in the State of New Jersey and I represent Debtor Luis Reynoso.
2. As such, I am familiar with the facts and circumstances of this matter and I make this Certification in Response to the Objection to the Plan filed by the Trustee.
3. The Profit and Loss for RV AUTO April and May 2022 have been deposited into the portal. The gross per month of the business on the average of 5 months is 17,640.00 minus the average expenses of those P/L is 10,933.00 leaving \$6,707.00 a month. Income was adjusted and Schedule I and J amended to support a 100% plan.
4. The homeowners policy expiring on July 28, 2022, has been updated and deposited into the portal.
5. The plan has been modified under 5a treatment of unsecured claims to 100%.
6. Schedule I and J have been amended.
7. The preconfirmation certificate was filed.

8. There is no disposable income remaining and all allowed filed claims are being paid at 100%, without ordering an appraisal of the RV Auto.
9. For all of these reasons, I respectfully request that the Trustee and the Court confirm the modified plan.

I certify that the foregoing statements made by me are true. I am fully aware that I am subject to punishment if any of the foregoing statements made by me are willfully false.

***DELL'ITALIA & SANTOLA***

**/s/ John P. Dell'Italia**

Dated: July 19, 2022

BY: JOHN P. DELL'ITALIA, ESQ.